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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**THOMAS GLENN and PATSY
McKINNEY,**

11-CV-402-KI

PLAINTIFFS,

v.

**CITY OF PORTLAND, a public body,
DEFENDANT.**

**DECLARATION OF PATRICK E. JONES
(IN SUPPORT OF DEFENDANT'S
RESPONSE TO PLAINTIFF'S
MEMORANDUM IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY
JUDGMENT)**

I, Patrick E. Jones, state:

1. I have been the Bureau of Emergency Communications Program Coordinator in charge of research production since 2004. I have been employed by the Bureau since 1991.
2. From my employment experience, training, and position with the City of Portland's Bureau of Emergency Communications ("BOEC"), I am familiar with Computer Aided Dispatch ("CAD") print-outs. The information contained on these CAD printouts is kept in the course of BOEC's regularly conducted business activities. It is the regular practice of BOEC to create CAD printouts.
3. From my employment experience, training, and position with the City's BOEC, I

am also familiar with BOEC's receipt of 9-1-1 calls and dispatch of police officers in response to those 9-1-1 calls. These 9-1-1 calls and dispatch communications are stored electronically and are kept in the regular course of BOEC's regularly conducted business activities. It is the regular practice of BOEC to record and store these 9-1-1 calls and dispatch communications.

4. I have reviewed the CAD printout attached to my declaration as Exhibit 1. The incident number on the CAD print out is PP0808120520. "PP" indicates Portland Police. The next symbols "080812" indicate the year, month, and date of the occurrence. The next symbol "0520" indicates the 520th call created in the Computer Aided Dispatch system for that day. This CAD printout indicates that at 09:01:48 hours (nine a.m., 1 minute and 48 seconds) on August 12, 2008, BOEC received a 9-1-1 call from a complainant who said he or she was walking past the location at 4704 NE 6th Avenue, and was hearing slamming and a female screaming from inside the location. This CAD printout indicates that at 09:02:18 BOEC dispatched police officers Freddie J. Jackson and Douglas A. Matthews to this location.

5. The 9-1-1 call and dispatch call for incident PP0808120520 was recorded and stored in the course of BOEC's regularly conducted business activities. Several months ago I received a request from the Portland City Attorney's Office for a copy of these recordings and I provided the City Attorney's Office audio files containing true and accurate copies of those recordings.

6. I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED this 12 day of January , 2012.

/s/ Patrick E. Jones
PATRICK E. JONES